



Focus on Pollution Prevention Planning Requirements

In 1990, the Legislature passed Chapter 70.95C RCW to establish state policies and goals that encourage the reduction of hazardous substance use and the generation of hazardous waste. The law achieves its goals by requiring certain hazardous waste generators and hazardous substance users to prepare a Pollution Prevention Plan (plan) for voluntarily reducing hazardous substance use and hazardous waste generation.

Plans must consider management options based first on hazardous substance use and hazardous waste reduction, second on recycling, and third on treatment. Ecology's pollution prevention planning law, Chapter 173-307 WAC, identifies the specific requirements for developing Pollution Prevention Plans.

Pollution Prevention Plan Required Elements

The required planning elements include:

- A description of the facility, products made or services provided, levels of production or service activity, and a description of prior pollution prevention accomplishments.
- A signed policy statement that shows management and corporate support for the planning effort, plus a statement that risk will not be shifted to other environmental media.
- A description of employee training and involvement programs.
- A description of the cost accounting system used to identify hazardous substance use and hazardous waste management costs.
- An identification of hazardous substances used and hazardous waste generated.
- A description of processes used in the facility.
- An identification and evaluation of all reasonable opportunities for further reduction, recycling, and treatment activities.
- A list of opportunities selected for implementation, performance goals for the five year life of the plan, and an implementation schedule.

Pollution Prevention Planning Guidance

Ecology offers guidance to assist facilities in preparation of their plans and Five-year Updates. An electronic version of this guidance is available that integrates the previous Pollution Prevention Plan and Annual Progress Report guidance formats. This guidance provides a concise electronic planning procedure, and encompasses an entire five-year planning cycle

into one document. Completing this guidance according to the instructions should result in an acceptable plan. Planning guidance is available upon request or on our website at: www.ecy.wa.gov/programs/hwtr/p2/p3.html

Pollution Prevention Planning Documents Must be Submitted

While implementation of a Pollution Prevention Plan is voluntary, submittal of plans, Executive Summaries, Five-year Updates and Annual Progress Reports is mandatory. According to WAC 173-307-100, failure to develop and submit a document may result in a penalty fee of not less than \$1,000, or three times the previous year's planning fee, whichever is greater. This penalty may be charged each year for non-submittal of documents, in addition to the current year's planning fee. The plan itself may remain at the facility, but an executive summary must be submitted.

Plan Due Date

Facilities must file plans on September 1 of the year after the first year they become a hazardous substance user or hazardous waste generator, as defined in the pollution prevention planning law.

Annual Progress Reports are Required

Each year, Ecology collects progress reports on September 1, following the due date of the plan. The progress report provides information on the progress made to implement the plan during the prior calendar year.

Five-year Updates are Required

Planning facilities must submit plan updates every five years. Plan updates are due on September 1 in the fifth year after the due date of the original plan.

Environmental Management System Alternative

Ecology offers a more flexible alternative to planning for qualified facilities. A facility required to prepare a Pollution Prevention Plan or Five-year Update may be able to meet these requirements by submitting documentation that they have an operating Environmental Management System (EMS) in place that meets predefined pollution prevention criteria. ISO 14001 is one example of an environmental management system that may substitute for a plan, provided Ecology's criteria are met. Facilities are asked to indicate their intent to submit an EMS in writing to Ecology by June 1 of the year the Pollution Prevention Plan or Five-year Update is due. Annual Performance Reports are required each September 1 as long as the EMS is in effect.

Document Review Process

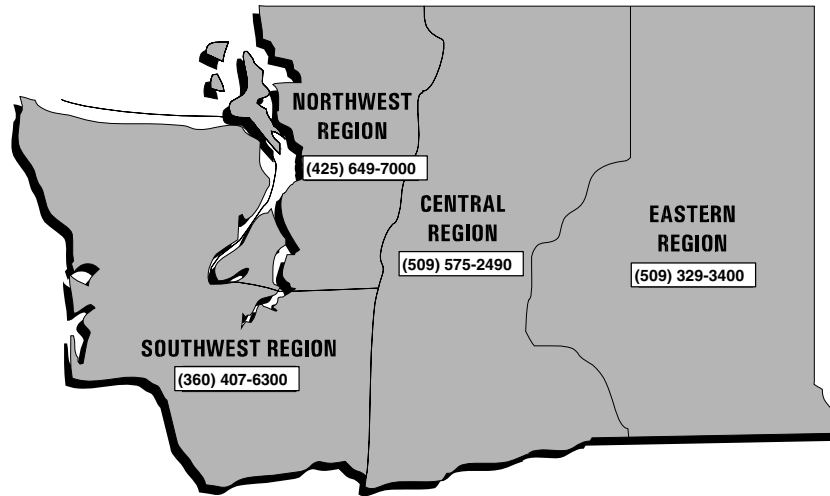
Ecology staff may review plans, Executive Summaries, Five-year Updates, Annual Progress Reports, and Environmental Management Systems to determine their adequacy. This determination will be based on whether the



documents are submitted on time, complete and prepared according to the planning requirements in Chapter 173-307 WAC. Ecology reviewers will notify planning facilities if any part of the document is not adequate. Ecology staff will assist planning facilities in bringing submitted documents to adequacy.

For More Information

More information contact your nearest regional office:



If you have special formatting needs for this publication, call (voice) 360-407-6759 (voice) or 711 or 800-833-6388 (TTY).